

EXHIBIT 41

DATA REPORT

**THOMAS O. JACKSON, Ph.D., MAI, CRE and
TREVOR PHILLIPS, FRICS, ASA, CRE**

May 9, 2018

This report presents data relied upon by both Thomas O. Jackson, Ph.D., MAI, CRE, and Trevor E. Phillips, FRICS, ASA, CRE, in developing their individual analyses and opinions with respect to the matter of *James D. Sullivan, et al., v. Saint-Gobain Performance Plastics Corporation; In the United States District Court for the District of Vermont*. The individual analyses and opinions are presented in separate reports titled Expert Report of Thomas O. Jackson, Ph.D., MAI, CRE, dated May 9, 2018; and Expert Report of Trevor E. Phillips, FRICS, ASA, CRE, dated May 9, 2018.

SCOPE OF WORK: In collecting the data for this report, we or those assisting us and under our direction, performed the following scope of work:

- 1) reviewed the plaintiffs' Second and Third Amended Class Action Complaints and other documents as submitted by plaintiffs in this matter with respect to a proposed class of real property damage claimants;
- 2) reviewed the environmental history of the area;
- 3) inspected the properties in the proposed class area on September 9, 2017, October 28, 2017 and April 9, 2018;
- 4) reviewed the land use and property type classification systems utilized by the Town of Bennington Department of Assessment;
- 5) obtained property records and other data for the properties in the proposed class area and developed a geographical information system (GIS) with this and other data;
- 6) tabulated the number of parcels, land area and assessed values for properties in each property use/land use category describing the distribution of property types;
- 7) conferred with a knowledgeable local appraiser concerning the properties in the proposed class area;
- 8) reviewed a public records search of potential environmental disamenities in the Bennington area obtained from Environmental Data Resources (EDR);
- 9) reviewed the Town of Bennington Housing Report dated November 2014; and

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10) prepared this report and related exhibits.

Mr. Benjamin Jackson, an Appraisal Trainee in the state of Texas, provided professional assistance in the development of this report.

PROPOSED CLASS DEFINITION: The proposed property damages and groundwater protection act class is defined in the Plaintiffs' Third Amended Complaint as "all natural persons, whether minor or adult, including any person claiming by, through or under a Class Member, who have interests in real property within the Zone of Contamination, including, but not limited to, those persons whose private water supply wells have been found to be contaminated with PFOA above 20 ppt."¹

PROPERTY TYPES WITHIN THE PROPOSED CLASS AREA: The boundary of the proposed class area, as defined in paragraph 76 of the Third Amended Complaint in this matter, is depicted in Exhibit 1. According to information from the Town of Bennington Department of Assessment, there are 2,965 properties within the proposed class area.² These properties include various residential, commercial, industrial and institutional uses, as well as vacant land.

The properties within the proposed class area have been classified based on the property types set forth in *The Dictionary of Real Estate Appraisal, Sixth Edition*, published by the Appraisal Institute. Based on this classification system, the proposed class area includes properties that fall within 77 distinct property types. Exhibit 2-1 presents a color-coded map depicting the various property types present in the proposed class area. Exhibit 2-2 shows the distribution of parcels in each property type category, as well as the percentage of total land area and assessed value that each property type represents.

NEIGHBORHOODS WITHIN THE PROPOSED CLASS AREA: There are six distinct neighborhoods or subareas within the proposed class area, as depicted in Exhibit 3. These neighborhoods were identified according to guidelines set forth in *The Appraisal of Real Estate, 14th Edition*, published by the Appraisal Institute,³ and with the assistance of a knowledgeable local appraiser.

The Village of North Bennington: The first defined subarea is the Village of North Bennington, located in the northwest portion of the proposed class area. Residential properties in the area vary widely and include older properties mixed in with newer homes. Some homes have deferred maintenance and are in need of repairs, while others appear to have been recently renovated. The houses tend to be small with a relatively high density.

The central feature of North Bennington is Bennington College. The influences of the college can be seen throughout the area in the form of various art exhibits and sculptures. Northwest of

¹ Plaintiffs' Third Amended Complaint, filed 10/5/17, page 19.

² Data on tax exempt parcels was not available from the Town of Bennington Department of Assessment, and therefore tax exempt parcels are not included in this count.

³ See *The Appraisal of Real Estate, 14th Edition*, pages 163-171.

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the campus is the center of North Bennington. This area contains a mix of residential and commercial properties; including restaurants, small retail shops, and a variety of other uses. Two of the larger buildings in the area are the North Bennington train station and Whitman's Feed Store, an industrial property.

South of the Village center, along Water Street, is the National Hangar Company's factory and several other industrial buildings including Dion Snowshoes, Sterling Gun Drills, and TE Connectivity. There are several small single-family residential neighborhoods located to the south of the industrial area. To the southwest, along Harrington Road, is the Town of Bennington Wastewater Treatment and Compost Facility. The subarea's western border abuts the New York-Vermont state line.

One of the major draws of the area is The Village School of North Bennington. This independent elementary academy is a major demand factor for housing in North Bennington, and also attracts residents of South Shaftsbury. Other notable features of North Bennington are Lake Paran, the Park-McCullogh House and Eddington House Inn. Exhibit 4-1 presents photos of a number of properties in the Village of North Bennington.

East End: The East End subarea encompasses the areas to the north and east of Downtown. The area extends slightly past Route 7A on the western border and abuts the Green Mountains on the eastern border. East End is categorized by larger lots and expanding suburban sprawl. Homes are typically on large lots with slightly above average assessed values for the proposed class area. There are also some mobile home parks in the area, including Chapel Home Park and Sunset Mobile Home Park.

The area also has a number of non-residential properties. In the southwestern corner lies a small cluster of industrial properties including NSK Steering Systems America and Abacus Automation. North of the industrial area is Mt. Anthony Middle School. There is a diverse commercial corridor along Route 7A. Two other noteworthy features of the area are Le Blanc's Auto Recycling and the Casella Waste Systems Landfill. Exhibit 4-2 presents photos of properties in the East End subarea.

West End: The West End subarea represents the area south of The Village of North Bennington and west of Old Bennington. This rural area contains fewer homes than the other areas, excluding The Flats. The area is defined by large acreage properties, with over 75% of homes located on more than an acre of land. The West End tends to attract potential home buyers who are interested in larger lot sizes.

Non-residential properties are limited in number in the West End subarea. Some of these non-residential properties include the Bennington Center for the Arts, Brookdale Fillmore Pond (a senior living facility), and the William H. Morse State Airport. Photos of properties in the West End subarea are included in Exhibit 4-3.

The Flats: The Flats is the commercial strip of Bennington. Cutting through the center of this subarea is Northside Drive, also known as VT-67A. This area is dominated by large commercial

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and industrial tracts, with a few homes scattered throughout the area. Some of the major commercial sites in The Flats include Wal-Mart, Home Depot and a Best Western hotel. Industrial sites include Vermont Timber Frames, L&G Fabricators, and K&E Plastics. Additionally, there are numerous restaurants in this subarea. Willowbrook Apartments, a 75-unit affordable housing complex operated by the Bennington Housing Authority, is located in the northeast section of The Flats. Molly Stark Elementary School is adjacent to Willowbrook Apartments. Applegate Apartments is a 103-unit affordable housing community located northwest of Willowbrook. The Bennington Welcome Center is located at the crossing of US Route 7 and VT-279. This newly renovated visitor's center has several displays covering Bennington's diverse history. Photos of properties in The Flats are depicted in Exhibit 4-4.

Old Bennington: Old Bennington consists primarily of historic homes and landmarks. The area is centered around the Bennington Battle Monument, which commemorates a Revolutionary War battle that was fought in the area. Visitors can get a panoramic view of the surrounding city and mountains from the viewing area at the top of the monument. Large Victorian-era homes are located near the monument. These homes are typically well-maintained and sit on larger than average lots. Northeast of the monument is the Mt. Anthony Golf Club and surrounding neighborhoods. Other notable historic features of the area include the Bennington Museum and Vermont School for Girls. Photos of properties in Old Bennington are presented in Exhibit 4-5.

Downtown: Downtown Bennington is located at the southeastern side of the proposed class area. While the downtown area expands further south along Route 7, only the portion of the area north of Main Street falls within the proposed class area. The Downtown subarea is defined by smaller homes on small lots with relatively high density, boasting more than double the number of homes in North Bennington. Downtown Bennington also has the lowest average assessed building value and the lowest average lot size for residential properties in the proposed class area.

Among the close-knit houses and apartments there are numerous commercial buildings. Downtown Bennington has more commercial buildings than any other subarea, and they are typically located on small lots due to the space restrictions in this subarea. While some typical commercial buildings exist, there are a large number of commercial uses inside redeveloped buildings.

Some of the more unique commercial properties include The Blue Benn, Northshire Brewery, Fiddlehead at Four Corners and Vermont Mill Properties. The Blue Benn is a refurbished 1945 railcar turned diner. This cash-only diner has become a local favorite with their assortment of breakfast and dinner options. Northshire Brewery is a craft brewery located in an older remodeled home. Fiddlehead at Four Corners is an art store and gallery located in a renovated bank building. This store sells a variety of art and makes use of the former vault as a chalkboard for visitors. Vermont Mill Properties is a large redevelopment on roughly 12.5 acres. Formerly known as the Holden-Leonard Mill, the property used to operate as a cotton mill, changing hands multiple times throughout its history. In 1999, the property was converted into its current use, providing office, studio, warehouse and manufacturing space for local businesses.

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In addition to the commercial uses in the Downtown subarea, there are some industrial properties in the northwest portion along Bowen Road. These industrial sites consist of factories and warehouses on large lots. Another industrial site located near the center of the Downtown subarea is the former Energizer Factory, which closed in 2015. Also in the Downtown subarea are special purpose buildings such as the Vermont Veterans Home, Mt. Anthony Union High School and Bennington Elementary School. Exhibit 4-6 presents photos of a number of properties located in the Downtown subarea.

Table 1-1 presents the average lot size and average assessed land and building values for residential properties⁴ in each of the six subareas within the proposed class area.

Table 1-1. Residential Properties in Each Subarea

<u>Neighborhood</u>	<u>Average Assessed Land Value</u>	<u>Average Assessed Building Value</u>	<u>Average Lot Size in Acres</u>
Downtown	\$24,237	\$99,145	0.381
East End	\$32,256	\$119,525	3.526
North Bennington	\$33,331	\$119,592	3.378
Old Bennington	\$53,207	\$168,043	1.810
The Flats	\$27,036	\$102,337	2.043
West End	\$56,580	\$142,399	7.438

Table 1-2 presents the average lot size and average assessed land and building values for non-residential properties in each of the six subareas within the proposed class area.

Table 1-2. Non-Residential Properties in Each Subarea

<u>Neighborhood</u>	<u>Average Assessed Land Value</u>	<u>Average Assessed Building Value</u>	<u>Average Lot Size in Acres</u>
Downtown	\$65,700	\$367,702	2.560
East End	\$52,881	\$294,767	19.808
North Bennington	\$35,312	\$920,391	9.650
Old Bennington	\$47,374	\$343,738	7.421
The Flats	\$192,581	\$583,967	5.341
West End	\$53,583	\$48,055	48.961

VARIATIONS WITHIN THE PROPOSED CLASS AREA: According to a study conducted by the Town of Bennington in November 2014,⁵ there was a higher percentage of rental stock in certain areas of the town, particularly around the central business district, as well as differences in housing quality across areas of Bennington. Much of these differences were due to Bennington being a mix of both urban and rural properties, but a significant difference in quality of the housing stock across levels of income was also noted. Policies advocated by the Town of Bennington included a shift toward higher density and lower-income housing.

⁴ The residential properties summarized in Table 1-1 include all single-family homes, single-family homes on acreage and mobile homes.

⁵ The Town of Bennington Housing Report, November 2014.

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ENVIRONMENTAL HISTORY AND CONDITION: The former Chemfab facilities are located on Northside Drive in Bennington and on Water Street in North Bennington. The facilities were utilized to produce coated fabrics for use in aerospace, automotive and electronics industries.⁶ The finished products developed by Chemfab were made to resist heat and chemical reactions, as well as repelling oil, stains, and grease.⁷ Chemfab operated at the Bennington location from 1968 to 1978. In 1978 operations were moved to North Bennington where Chemfab operated until 2000, when it was acquired by Saint-Gobain. Fabric coating operations continued at the Water Street facility until it shut down in 2002.⁸

Sampling and Testing: After hearing about the presence of perfluorooctanoic acid (PFOA)⁹ in the drinking water surrounding a Chemfab facility in New York, a private citizen contacted local legislators to voice concerns about the former Chemfab facility in North Bennington. The Vermont Department of Environmental Conservation (VDEC) sampled five private drinking water wells and the North Bennington municipal water supply. While PFOA was not detected in the municipal water supply, PFOA was detected in the five private wells at concentrations above the Vermont Department of Health's drinking water health advisory level (20 parts per trillion or ppt). As a result of these initial tests, the VDEC began a program to test the private water wells within a 1.5-mile radius of the North Bennington facility.¹⁰

In February 2016, the state hosted a community meeting to inform North Bennington residents about the discovery of PFOA in certain drinking water wells and to answer residents' questions. The state advised residents within 1.5 miles of the former Chemfab facility to cease consumption of their water until the additional testing was complete.¹¹ Following this community meeting, multiple news outlets began coverage of this news story. The initial 1.5-mile testing radius was expanded to include other areas in North Bennington, Bennington, and small portions of Shaftsbury to the north and Pownal to the south (collectively, these areas were eventually defined as the "designated area of interest"). See Figure 1 for a depiction of the initial 1.5-mile testing radius and the "designated area of interest" as of May 25th, 2016.¹²

⁶ Saint-Gobain, "Frequently Asked Questions," Benningtonwater.com.

⁷ Vermont DEC Agency of Agriculture, Food, & Markets Department of Health, Summary for Legislators: PFOA Contamination in North Bennington, March 25, 2016.

⁸ Stipulation for the Entry of Consent Order.

⁹ Perfluorooctanoic acid (PFOA) also known as C8.

¹⁰ Vermont DEC Agency of Agriculture, Food, & Markets Department of Health, Summary for Legislators: PFOA Contamination in North Bennington, March 25, 2016.

¹¹ Vermont Public Radio (VPR), "State: Do Not Drink Well Water Near North Bennington Plant," vpr.net.

¹² Area of interest is provided by the Vermont Agency of Natural Resources (May 25, 2016).

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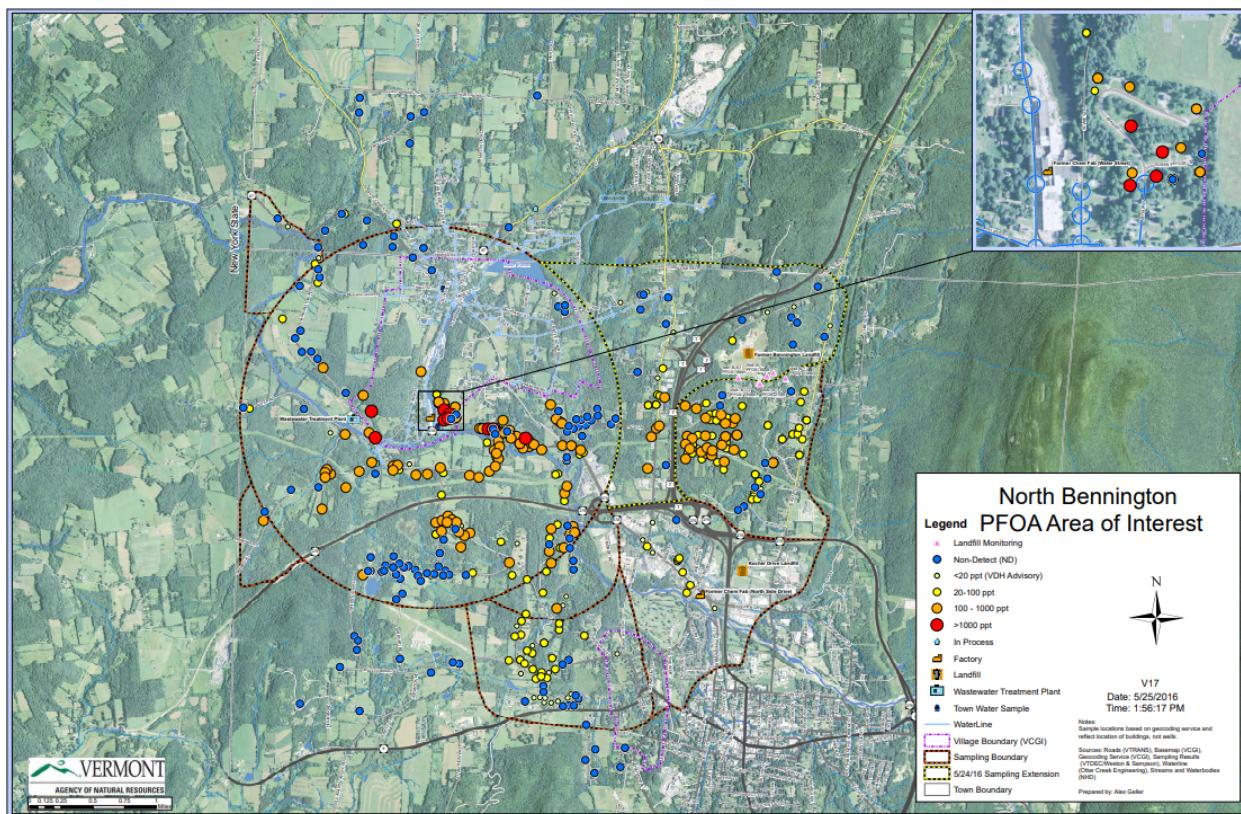


Figure 1. 1.5-mile Testing Radius and the Designated Area of Interest

In addition to the wells tested by the VDEC, residents located within the “designated area of interest” could request well testing by completing a form on the VDEC website.¹³

Test Results: Following the initial round of testing, in September 2016 the State began resampling wells that previously tested below 20 ppt of PFOA.¹⁴ As of April 2017, 570 drinking water wells had been tested for the presence of PFOA. Of the wells tested, 276 contained PFOA concentrations above the 20 ppt threshold. As a result, 255 Point-of-Entry Treatment (POET)¹⁵ systems were installed, and eleven houses and businesses were hooked up to nearby municipal water lines.¹⁶ As of July 2017, 592 drinking water wells had been tested, of which 298 contained PFOA concentrations above the 20 ppt threshold.¹⁷

Consent Order: As a part of the October 2017 Consent Order between Saint-Gobain and the Agency of Natural Resources (ANR), Saint-Gobain agreed to fund the extension of the

¹³ Vermont, Department of Environmental Conservation – Well Testing Request Form, <http://dec.vermont.gov/commissioners-office/pfoa/communities>.

¹⁴ Vermont, Department of Environmental Conservation, “Summary of Bennington and North Bennington PFOA Community Meeting on April 27, 2017.”

¹⁵ The POET systems were successful in reducing the PFOA concentrations below the 20 ppt level.

¹⁶ Update PFOA Response (Testing Results, POETS, Site Investigation, Next Steps), April 27, 2017, Public Meeting – Vermont DEC.

¹⁷ Stipulation for the Entry of Consent Order.

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municipal water lines to residents in North Bennington and the western portion of Bennington (eventually defined as Corrective Action Area I – see Figure 2 on the following page). All homes in Corrective Action Area I, regardless of PFOA levels in drinking water wells, are eligible for municipal water connection to the extent such connections are feasible.¹⁸ Construction of these water lines began in October 2017 and the project includes approximately 14 miles of new water mains. It will connect approximately 220 homes and businesses.¹⁹ For homes within Corrective Action Area I with private wells with PFOA levels above 20 ppt, where a municipal water line extension is not feasible, Saint-Gobain will either operate and maintain a POET or drill a replacement well, if feasible.²⁰

Under the Consent Order, Saint-Gobain is required to complete an expedited investigation in eastern Bennington (the eastern portion of the impacted area – Corrective Action Area II) to determine the degree of PFOA in the area, the source(s) of PFOA, and a suitable remediation, if any.²¹ A map depicting Corrective Action Area I (blue) and Corrective Action Area II (yellow) is presented in Figure 2 below.

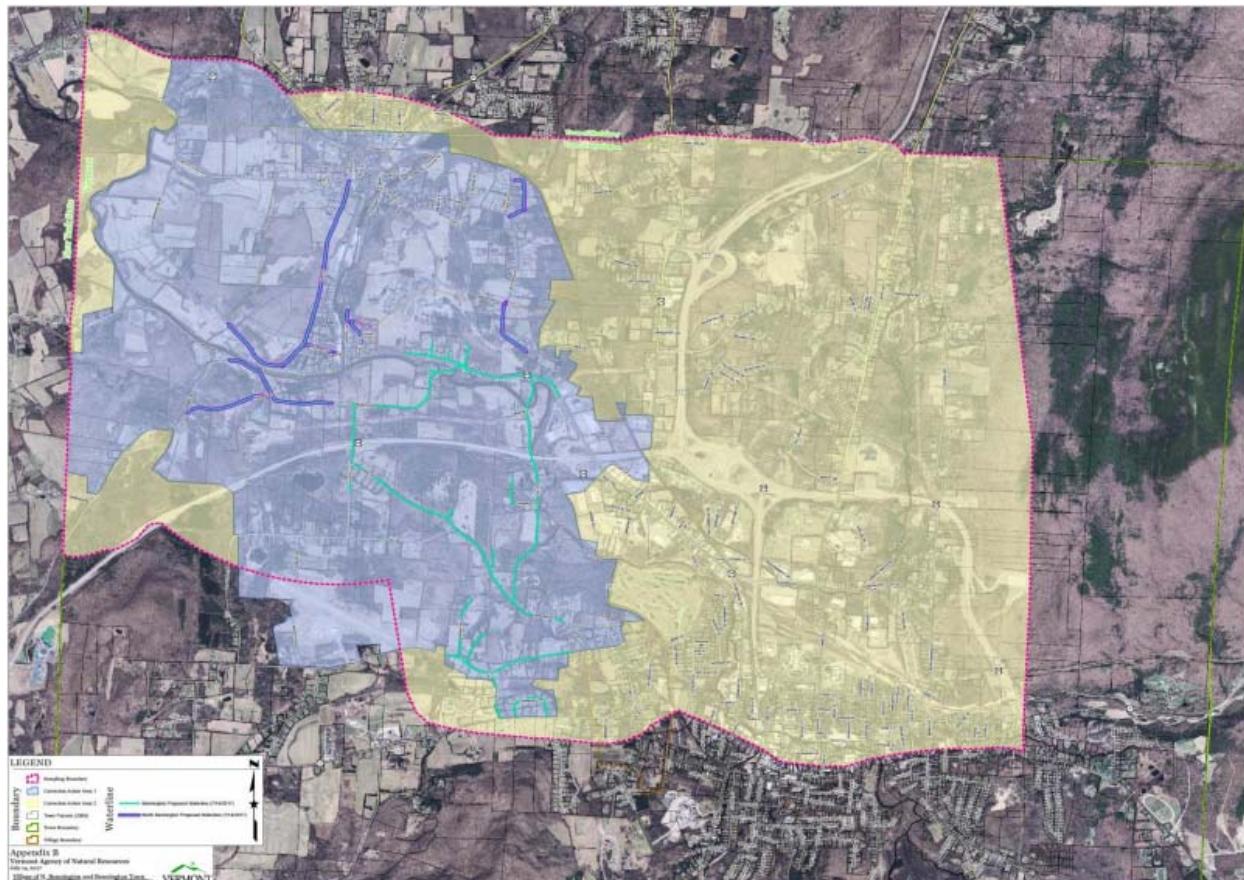


Figure 2. Corrective Action Area I and II

¹⁸ ANR Fact Sheet: State of Vermont Consent Order with Saint-Gobain, July 26, 2017.

¹⁹ “Waterline Extension Connection Update – December 11, 2017”, benningtonvt.org.

²⁰ ANR Fact Sheet: State of Vermont Consent Order with Saint-Gobain, July 26, 2017.

²¹ ANR Fact Sheet: State of Vermont Consent Order with Saint-Gobain, July 26, 2017.

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OTHER ENVIRONMENTAL DISAMENITIES: There are multiple potential sources of environmental contamination and other environmental influences both in and around the proposed class area. A comprehensive public records search by Environmental Data Resources Inc. (EDR), a United States environmental information services and consulting company, revealed a number of environmental disamenities in the area.

There are two sites in Bennington that are listed on the National Priorities List (NPL), a database which identifies sites for priority cleanup under the U.S. Environmental Protection Agency's (EPA's) Superfund Program. The Bennington Municipal Sanitary Landfill, located off of Houghton Lane, was added to the NPL in 1989. The site consists of a 15-acre solid waste landfill, an associated drainage pond situated on an 85-acre parcel, and the surrounding areas affected by the landfill. The landfill began operation in 1969 and received commercial, residential, and industrial solid and liquid wastes. Liquid wastes were disposed of in an unlined lagoon. The lagoon was closed in 1975 and filled in with landfill material, and in 1976 a buried drain system was constructed that was designed to lower the groundwater level under the landfill by discharging water through a culvert into an unlined, ponded area. In 1986, VDEC detected PCBs, lead, arsenic, benzene and ethylbenzene in the groundwater discharging from the culvert. Morgan Spring, a bedrock water source approximately 2.8 miles south of the landfill, was used at the time to supplement the Bennington water system, and over 2,000 residents used private wells within three miles of the site. In December 1994, the EPA signed an Action Memorandum to initiate a non-time-critical removal action (NTCRA) at the site to address the source of contamination. The major components of the NTCRA included construction of a multi-barrier landfill cap, construction of an upgradient interceptor trench to divert groundwater upgradient of the landfill, construction of a leachate collection and treatment system, and excavation and consolidation of sediments and soils with PCB concentrations above 1 mg/kg.²²

Jard Company, Inc., located at 239 Bowen Road in Bennington, is also listed on the NPL. This 34-acre property was formerly occupied by a manufacturing facility that was demolished in 2005. From 1969 to 1989, Jard Company manufactured capacitors, non-fluid transformers and motors used in household appliances. Hazardous wastes generated included PCBs, TCE, paints and paint solvents, among others. Two dry wells located on the property potentially received wastewater contaminated with PCBs. The EPA began a remedial investigation of this site in May 2016.²³

There are three other sites in the proposed class area that are currently located in the Superfund Enterprise Management System (SEMS) database, and six additional sites located in the SEMS

²² Information on this site was obtained from the EDR Site Report "Bennington Municipal Sanitary Landfill, Off Houghton Lane, Bennington, VT 05201," and from the EPA website, "Superfund Site: Bennington Municipal Sanitary Landfill, Bennington, VT, Cleanup Activities,"

<https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.Cleanup&id=0101493#bkground>.

²³ Information on this site was obtained from the EPA website, "Superfund Site: Jard Company, Inc., Bennington, VT, Cleanup Activities,"

<https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.Cleanup&id=0102282#bkground>.

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Archives. This database tracks hazardous waste sites, potentially hazardous waste sites and remedial activities performed in support of EPA's Superfund Program.

There have been 11 releases of oil and hazardous substances in the area, as recorded in the EPA's Emergency Response Notification System. These releases include a hydraulic oil leak; a release of black soot containing manganese dioxide, mercury dioxide and silver dioxide; a release of 1000 gallons of rinse water containing magnesium, nickel and mercury; and a release of 1500 gallons of oil from an above ground storage tank, among others.

There have been 7 hazardous material spill incidents reported to the Department of Transportation under the Hazardous Materials Incident Report System (HMIRS). The area also contains 9 brownfield sites, 2 pesticide enforcement actions, 5 air pollution point sources regulated by the EPA and/or state and local regulatory agencies, and 41 Vermont State Hazardous Waste sites. In addition, there have been 77 incidents of leaking underground storage tanks (LUSTs), 11 leaking above ground storage tanks, 185 spills of potentially hazardous material reported to the state, and 2 sites with institutional controls. A summary table listing these sites with environmental issues is presented in Table 2 on the following page. The map in Exhibit 5 shows the locations of these sites within and surrounding the proposed class area.

Table 2. Summary Table of Environmental Disamenities Within and Surrounding the Proposed Class Area

Type of Environmental Disamenity	Number of Sites
National Priorities List (NPL)	2
Superfund Enterprise Management System (SEMS)	3
SEMS – Archives	6
Emergency Releases (ERNS)	11
Hazardous Materials Spill Incidents (HMIRS)	7
Brownfields	9
Pesticide Enforcement Actions	2
Air Pollution Point Sources	5
Vermont State Hazardous Waste Sites	41
Leaking Underground Storage Tanks (LUSTs)	77
Leaking Above Ground Storage Tanks	11
Spills Reported to the State	185
Sites with Institutional Controls	2

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List of Exhibits

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Exhibit 2-1. Map of Property Types in the Proposed Class Area

Exhibit 2-2. Distribution of Property Types in the Proposed Class Area

Exhibit 3. Map of Subareas

Exhibit 4-1. Photos of Properties in North Bennington

Exhibit 4-2. Photos of Properties in East End

Exhibit 4-3. Photos of Properties in West End

Exhibit 4-4. Photos of Properties in The Flats

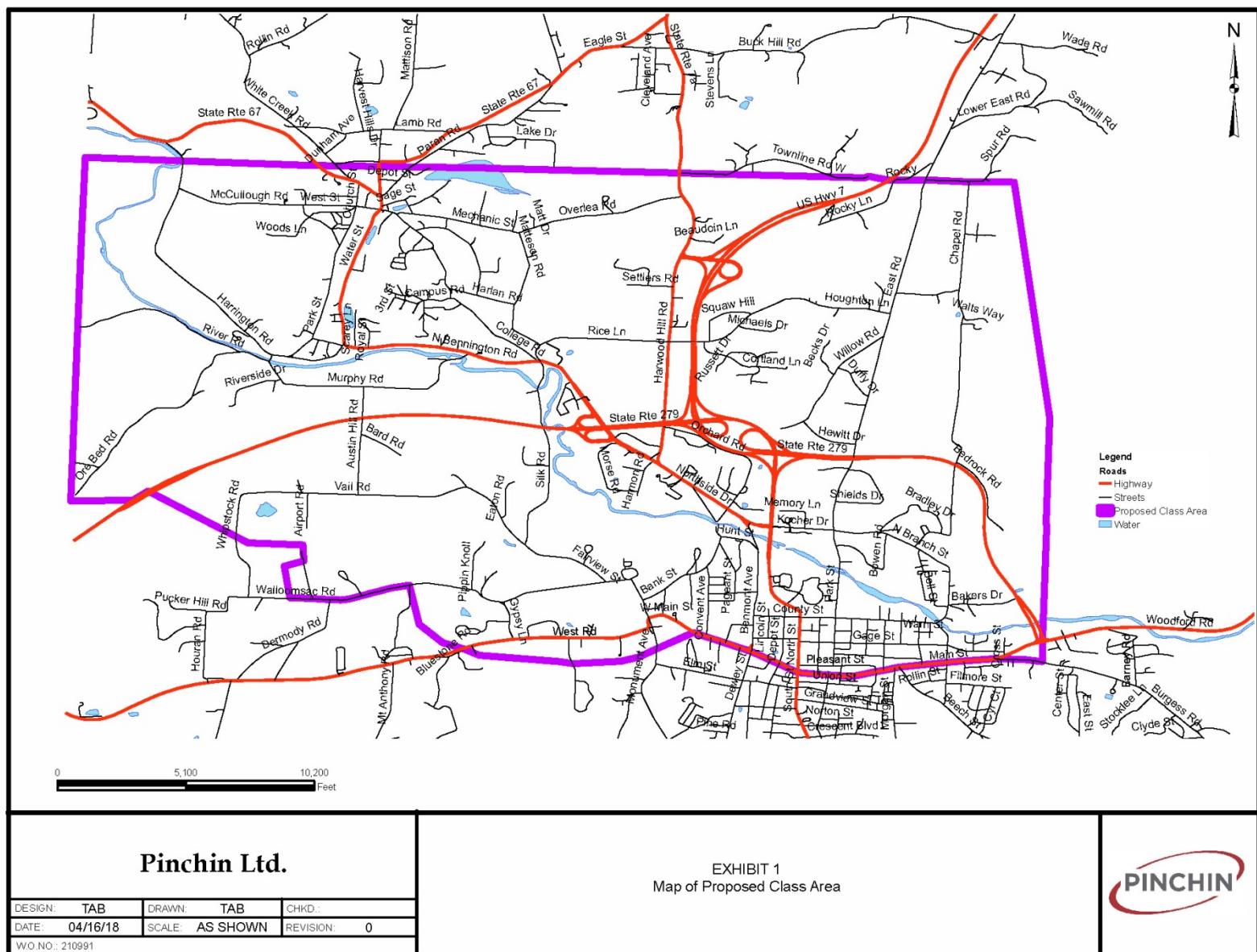
Exhibit 4-5. Photos of Properties in Old Bennington

Exhibit 4-6. Photos of Properties in Downtown

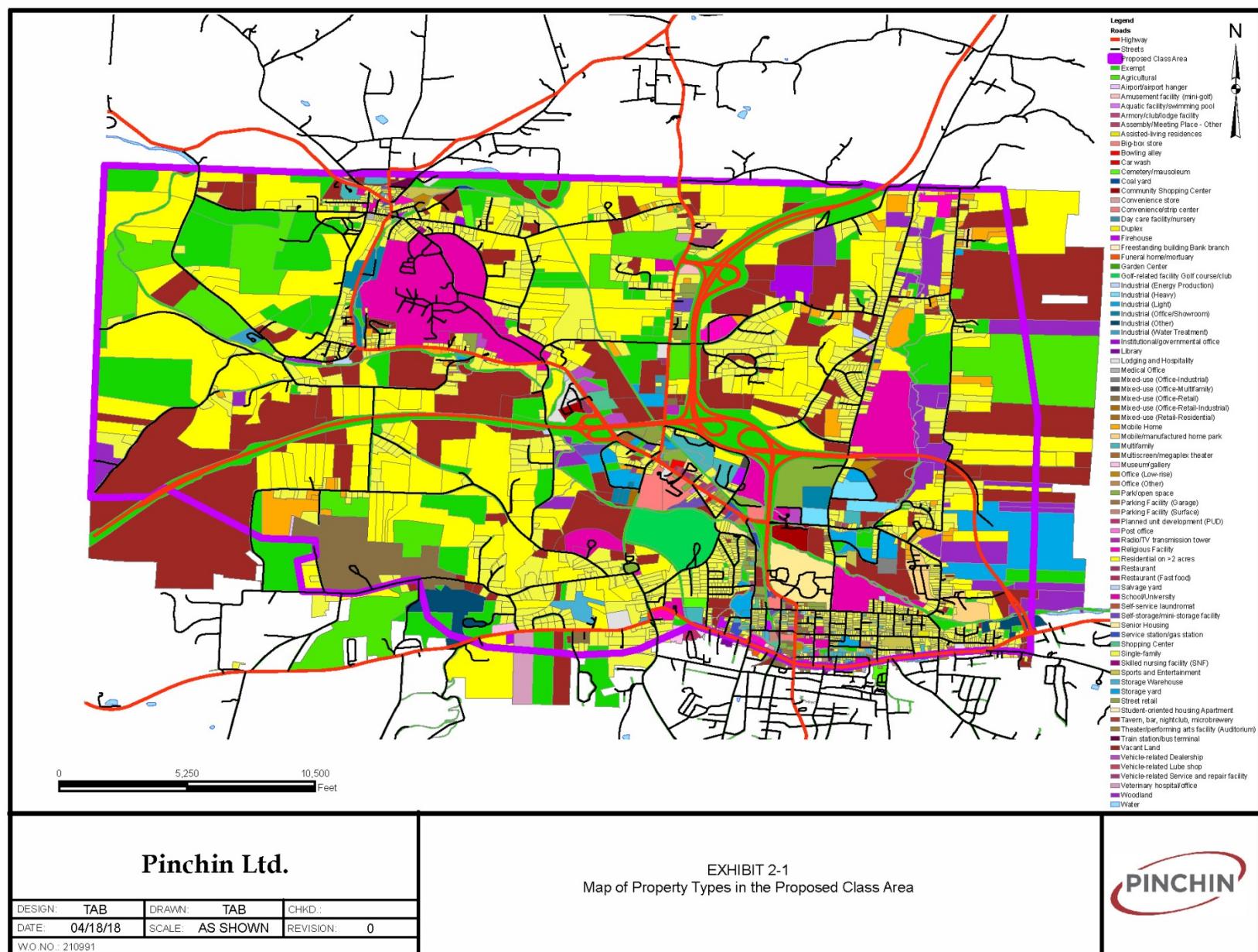
Exhibit 5. Map of Other Environmental Disamenities

Exhibit 6. Certification

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Pinchin Ltd.

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EXHIBIT 2-1
 Map of Property Types in the Proposed Class Area



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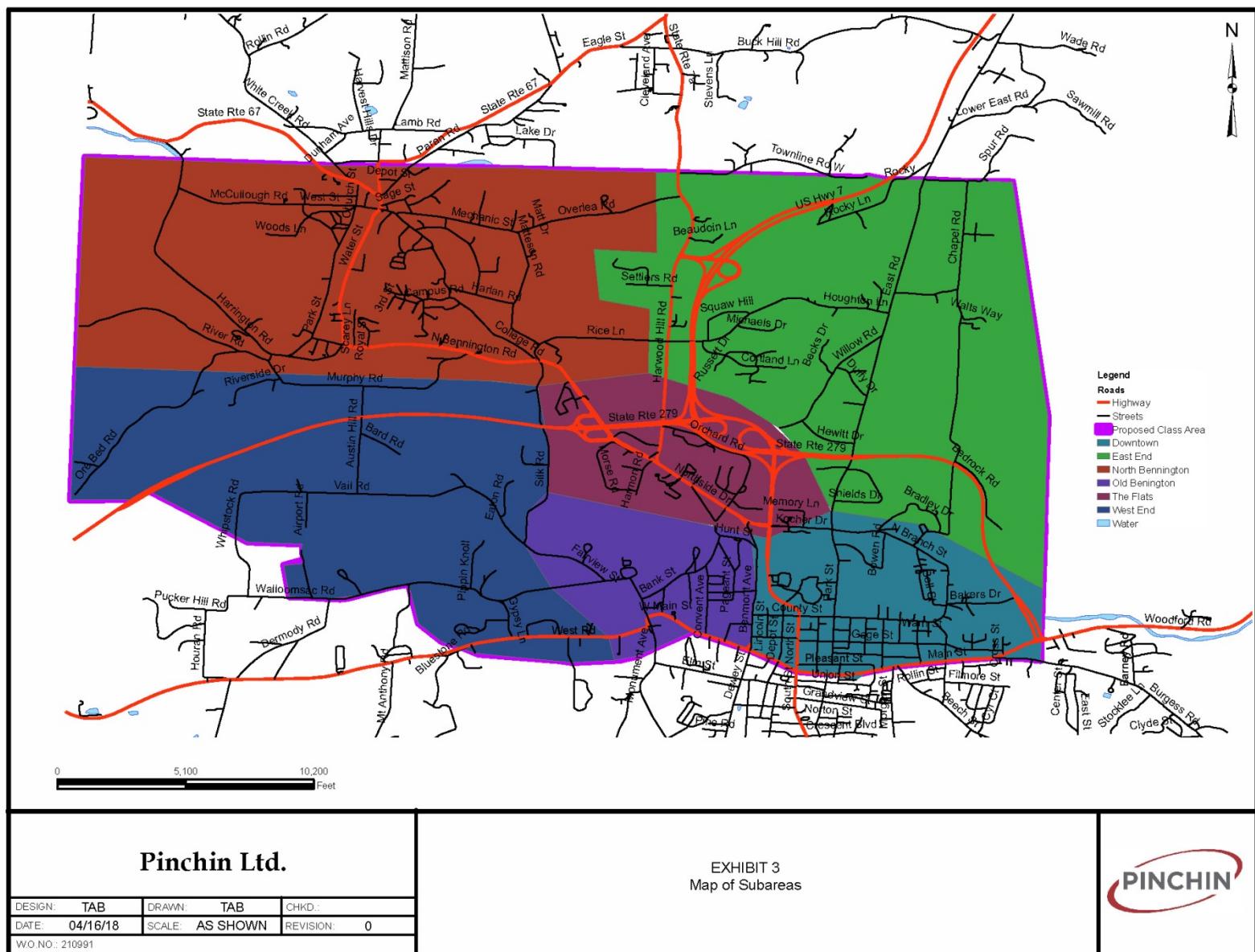
Exhibit 2-2. Distribution of Property Types within the Proposed Class Area

	No. of Parcels	% of Parcels	Total Acreage	% of Total Acreage	Assessed Value	% of Assessed Value
Agricultural	11	0.371%	1229.49	11.079%	\$2,843,300	0.394%
Airport/Airport Hanger	1	0.034%	1.3	0.012%	\$19,500	0.003%
Amusement Facility (Mini-Golf)	1	0.034%	4.14	0.037%	\$230,100	0.032%
Aquatic Facility/Swimming Pool	1	0.034%	0.57	0.005%	\$190,800	0.026%
Armory/Club/Lodge Facility	3	0.101%	1.41	0.013%	\$761,200	0.105%
Assembly/Meeting Place - Other	2	0.067%	1.05	0.009%	\$593,100	0.082%
Assisted-Living Residences	1	0.034%	1.85	0.017%	\$704,100	0.098%
Big-Box Store	4	0.135%	20.7	0.187%	\$10,616,100	1.471%
Bowling Alley	1	0.034%	2.82	0.025%	\$834,200	0.116%
Car Wash	1	0.034%	0.9	0.008%	\$573,400	0.079%
Cemetery/Mausoleum	5	0.169%	27.76	0.250%	\$142,100	0.020%
Coal Yard	1	0.034%	0.51	0.005%	\$1,300	0.000%
Community Shopping Center	2	0.067%	31.23	0.281%	\$10,873,100	1.507%
Convenience Store	6	0.202%	4.94	0.045%	\$1,848,700	0.256%
Convenience/Strip Center	1	0.034%	0.12	0.001%	\$329,800	0.046%
Day Care Facility/Nursery	2	0.067%	5.73	0.052%	\$1,321,800	0.183%
Duplex	3	0.101%	0.86	0.008%	\$559,600	0.078%
Firehouse	5	0.169%	8.19	0.074%	\$3,281,000	0.455%
Freestanding Building - Bank Branch	5	0.169%	3.25	0.029%	\$3,442,900	0.477%
Funeral Home/Mortuary	2	0.067%	1.85	0.017%	\$803,800	0.111%
Garden Center	1	0.034%	0.37	0.003%	\$538,200	0.075%
Golf Course/Club	1	0.034%	109.88	0.990%	\$1,767,300	0.245%
Industrial (Energy Production)	5	0.169%	5.36	0.048%	\$93,700	0.013%
Industrial (Heavy)	5	0.169%	48.48	0.437%	\$10,141,300	1.405%
Industrial (Light)	17	0.573%	261.12	2.353%	\$16,670,500	2.310%
Industrial (Office>Showroom)	10	0.337%	64.91	0.585%	\$11,055,100	1.532%
Industrial (Other)	2	0.067%	10.81	0.097%	\$204,800	0.028%
Industrial (Water Treatment)	1	0.034%	9.98	0.090%	\$47,133,400	6.532%
Institutional/Governmental Office	3	0.101%	37.98	0.342%	\$603,900	0.084%
Library	3	0.101%	4.14	0.037%	\$1,659,200	0.230%
Lodging and Hospitality	12	0.405%	44.99	0.405%	\$11,450,300	1.587%
Medical Office	4	0.135%	2.68	0.024%	\$1,719,100	0.238%
Mixed-use (Office-Industrial)	1	0.034%	8	0.072%	\$803,400	0.111%
Mixed-use (Office-Multifamily)	14	0.472%	4.06	0.037%	\$3,758,500	0.521%
Mixed-use (Office-Retail)	23	0.776%	20.9	0.188%	\$8,446,200	1.171%
Mixed-use (Office-Retail-Industrial)	1	0.034%	3.08	0.028%	\$278,900	0.039%
Mixed-use (Retail-Residential)	48	1.619%	7.69	0.069%	\$9,619,200	1.333%
Mobile Home	78	2.631%	185.01	1.667%	\$5,335,400	0.739%
Mobile/Manufactured Home Park	7	0.236%	62.59	0.564%	\$3,268,725	0.453%
Multifamily	49	1.653%	84.35	0.760%	\$17,751,800	2.460%

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	No. of Parcels	% of Parcels	Total Acreage	% of Total Acreage	Assessed Value	% of Assessed Value
Multiscreen/Megaplex Theater	1	0.034%	2.89	0.026%	\$725,000	0.100%
Museum/Gallery	2	0.067%	15.29	0.138%	\$1,676,200	0.232%
Office (Low-rise)	20	0.675%	19.94	0.180%	\$8,938,000	1.239%
Office (Other)	8	0.270%	5.01	0.045%	\$1,052,100	0.146%
Park/Open Space	12	0.405%	78.38	0.706%	\$5,194,900	0.720%
Parking Facility (Garage)	3	0.101%	3.27	0.029%	\$1,105,500	0.153%
Parking Facility (Surface)	5	0.169%	4.15	0.037%	\$369,700	0.051%
Planned Unit Development (PUD)	1	0.034%	19.3	0.174%	\$188,500	0.026%
Post Office	1	0.034%	0.2	0.002%	\$104,900	0.015%
Radio/TV Transmission Tower	1	0.034%	3.67	0.033%	\$160,000	0.022%
Religious Facility	17	0.573%	48.91	0.441%	\$6,265,100	0.868%
Restaurant	20	0.675%	10.12	0.091%	\$6,926,400	0.960%
Restaurant (Fast Food)	3	0.101%	2.03	0.018%	\$1,604,100	0.222%
Salvage Yard	1	0.034%	3.5	0.032%	\$108,200	0.015%
School/University	23	0.776%	536.55	4.835%	\$68,229,100	9.456%
Self-Service Laundromat	1	0.034%	0.48	0.004%	\$130,400	0.018%
Self-Storage/Mini-Storage Facility	6	0.202%	22.72	0.205%	\$3,736,800	0.518%
Senior Housing	3	0.101%	90.69	0.817%	\$20,066,300	2.781%
Service Station/Gas Station	17	0.573%	14.18	0.128%	\$5,315,900	0.737%
Shopping Center	4	0.135%	14.17	0.128%	\$7,179,400	0.995%
Single-Family Home	2030	68.465%	1782.72	16.064%	\$303,605,100	42.077%
Single-Family Home with Acreage	163	5.497%	3057.95	27.556%	\$41,469,900	5.747%
Skilled Nursing Facility (SNF)	2	0.067%	1.15	0.010%	\$686,900	0.095%
Sports and Entertainment	3	0.101%	21.21	0.191%	\$4,798,200	0.665%
Storage Warehouse	9	0.304%	27.4	0.247%	\$1,242,600	0.172%
Storage Yard	2	0.067%	4.14	0.037%	\$2,060,000	0.285%
Street Retail	41	1.383%	57.94	0.522%	\$11,612,000	1.609%
Student-Oriented Housing Apartment	1	0.034%	0.63	0.006%	\$369,800	0.051%
Tavern, Bar, Nightclub, Microbrewery	1	0.034%	0.3	0.003%	\$234,300	0.032%
Theater/Performing Arts Facility (Auditorium)	2	0.067%	0.94	0.008%	\$655,400	0.091%
Train Station/Bus Terminal	2	0.067%	0.95	0.009%	\$528,600	0.073%
Vacant Land	165	5.565%	2404.05	21.663%	\$7,895,500	1.094%
Vehicle-Related Dealership	10	0.337%	30.68	0.276%	\$9,277,400	1.286%
Vehicle-Related Lube Shop	2	0.067%	1.8	0.016%	\$935,500	0.130%
Vehicle-Related Service and Repair Facility	12	0.405%	19.28	0.174%	\$2,629,100	0.364%
Veterinary Hospital/Office	2	0.067%	85.9	0.774%	\$1,590,500	0.220%
Woodland	26	0.877%	379.88	3.423%	\$614,600	0.085%
Total	2,965	100.00%	11,097	100.00%	\$721,550,725	100.00%

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Exhibit 4-1. Photos of Properties in North Bennington

The Village of North Bennington, townhomes:



The Village of North Bennington, commercial:



Bennington College:



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Exhibit 4-2. Photos of Properties in East End



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Exhibit 4-3. Photos of Properties in West End



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Exhibit 4-4. Photos of Properties in The Flats



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Exhibit 4-5. Photos of Properties in Old Bennington



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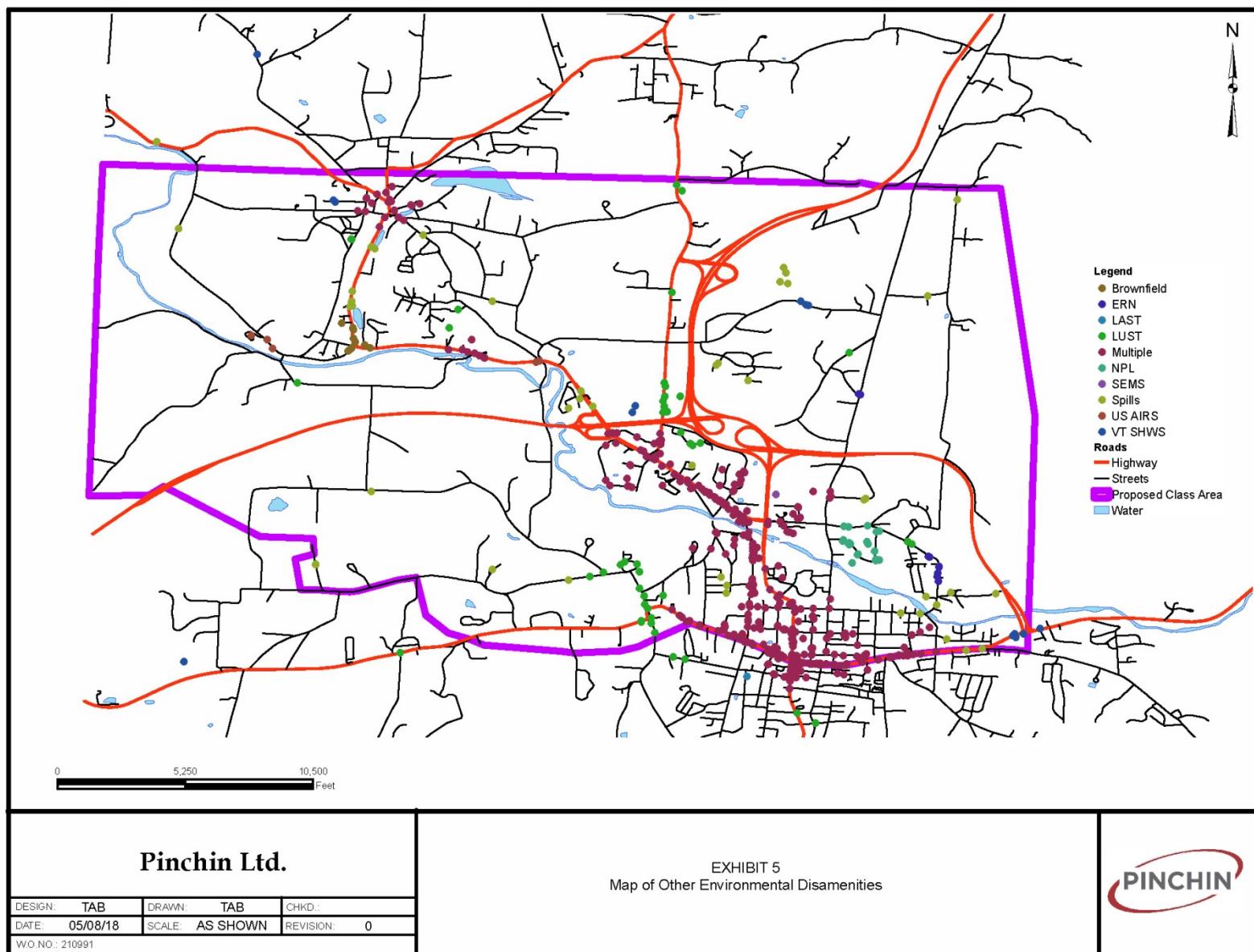
Exhibit 4-6. Photos of Properties in Downtown



Energizer battery factory:



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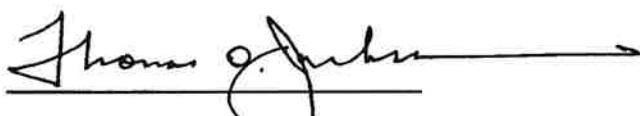


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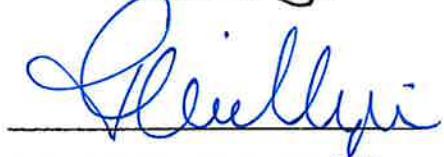
Exhibit 6. Certification

CERTIFICATION: We certify that, to the best of our knowledge and belief:

1. The statements of fact contained in this report are true and correct.
2. The reported analyses, opinions, and conclusions are limited only by the reported assumptions and limiting conditions and are our personal, impartial, and unbiased professional analyses, opinions, and conclusions.
3. We have no present or prospective interest in the properties that are the subject of this report and no personal interest with respect to the parties involved.
4. We have performed no other services, as an appraiser or in any other capacity, regarding the properties that are the subject of this report within the three-year period immediately preceding acceptance of this assignment.
5. We have no bias with respect to the properties that are the subject of this report or to the parties involved with this assignment.
6. Our engagement in this assignment was not contingent upon developing or reporting predetermined results.
7. Our compensation is not contingent on an action or event resulting from the analyses, opinions, or conclusions in this report or from its use.
8. Our compensation for completing this assignment is not contingent upon the development or reporting of predetermined assignment results or assignment results that favor the cause of the client, the attainment of a stipulated result, or the occurrence of a subsequent event directly related to the intended use of this report.
9. The reported analyses, opinions, and conclusions were developed, and this report has been prepared, in conformity with the requirements of the Code of Professional Ethics & Standards of Professional Appraisal Practice of the Appraisal Institute, which include the Uniform Standards of Professional Appraisal Practice.
10. The use of this report is subject to the requirements of the Appraisal Institute relating to review by its duly authorized representatives.
11. We have made a personal inspection of the properties that are the subject of this report.
12. Except for Jennifer Pitts of Belton, Texas, Chris Yost-Bremm of San Francisco, California, Benjamin Jackson of Houston, Texas, and Christopher Rutken of Manchester, VA, no one provided significant real property appraisal or appraisal consulting assistance to the undersigned.
13. As of the date of this report, Thomas O. Jackson has completed the continuing education program for Designated Members of the Appraisal Institute.
14. As of the date of this report, Trevor E. Phillips has completed the Standards and Ethics Education Requirements for Practicing Affiliates of the Appraisal Institute.



Thomas O. Jackson, Ph.D., MAI, CRE



Trevor E. Phillips, FRICS, ASA, CRE